

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

HOWARD SOLOMON,

Defendant.

Adv. Pro. No. 10-04307 (BRL)

**STIPULATION FOR EXTENSION OF TIME TO RESPOND**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendant Howard Solomon (“Defendant”) may move, answer, or otherwise respond to the Trustee’s complaint (the “Complaint”) is extended up to and including October 19, 2015.

The purpose of this stipulated extension (“Stipulation”) is to provide additional time for Defendant to move, answer, or otherwise respond to the Complaint. Nothing in this Stipulation is a waiver of Defendant’s right to request from the Court a further extension of time to move, answer, or otherwise respond to the Complaint and/or the Trustee’s right to object to any such request.

Undersigned counsel for Defendant: (i) expressly represents that as of the date of this Stipulation, Defendant represented by the undersigned counsel in the adversary proceeding is alive or that counsel has previously provided notice to the Trustee in writing of a Defendant's death; (ii) expressly agrees to notify the Trustee in writing of the death of Defendant within thirty (30) days of the date of such Defendant's death, and to provide to the Trustee the county and state of residence at the time of death of the deceased Defendant; and (iii) expressly agrees to reasonably cooperate with the Trustee, where applicable, by, among other things, (a) advising the Trustee whether a probate has or will be filed, (b) filing a Stipulation substituting the deceased Defendant's estate or personal representative/executor, and/or (c) advising the Trustee who will represent the deceased Defendant's estate herein and in any probate proceeding. For the avoidance of doubt, the parties to this Stipulation expressly agree that the obligations set forth in this paragraph shall continue beyond the time period addressed by the Stipulation and shall be ongoing for the duration of the above-captioned adversary proceeding.

The parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photocopy, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions of Time to Respond and Adjourn Pre-Trial Conferences (Adv. Pro. No. 08-01789 (SMB), Dkt. No. 10106).

Dated: September 14, 2015  
New York, New York

BAKER & HOSTETLER LLP

By: /s/ David J. Sheehan  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Nicholas J. Cremona  
Email: ncremona@bakerlaw.com

*Attorneys for Plaintiff Irving R. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
Bernard L. Madoff*

LAX & NEVILLE, LLP

By: /s/ Raquel Kraus  
1450 Broadway, 35<sup>th</sup> Floor  
New York, New York 10018  
Telephone: (212) 696-1999  
Facsimile: (212) 566-4531  
Brian J. Neville  
Email: bneville@laxneville.com  
Raquel Kraus  
rkraus@laxneville.com

*Attorneys for Defendant Howard Solomon*